

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

KRISTINE R. REDNOUR,)	
)	
Plaintiff,)	
v.)	CAUSE NO. 1:13-CV-0320-SEB-DKL
)	
WAYNE TOWNSHIP FIRE DEPT.;)	
WAYNE TOWNSHIP,)	
)	
Defendants.)	

**DEFENDANTS' WAYNE TOWNSHIP AND WAYNE TOWNSHIP FIRE
DEPARTMENT'S MOTION FOR SUMMARY JUDGMENT**

Defendants Wayne Township and Wayne Township Fire Department, by counsel, Christine L. Zook, pursuant to Rule 56 of the Federal Rules of Civil Procedure, respectfully requests that the Court enter summary judgment in their favor and against Plaintiff Kristine Rednour on all claims raised against them. There are no genuine issues of material fact and the Defendants are entitled to summary judgment as a matter of law.

In support of their Motion for Summary Judgment, the Defendants rely upon the following:

- A. Exhibit A: portions of the January 13, 2014 deposition of Felicity Morgan;
- B. Exhibit B: portions of the January 20, 2014 deposition of Richard Scott;
- C. Exhibit C: Affidavit of Gene Konzen, dated February 20, 2014;
- D. Exhibit D: portions of the January 16, 2014 deposition of Justin Sparks;
- E. Exhibit E: portions of the January 13, 2014 deposition of Jamison Barry;

- F. Exhibit F: portions of the January 24, 2014 deposition of Gene Konzen;
- G. Exhibit G: portions of the January 17, 2014 deposition of Kristine Rednour;
- H. Exhibit H: portions of the January 15, 2014 deposition of Dr. Samuel Wentworth;
- I. Exhibit I: portions of the January 13, 2014 deposition of Dr. Steven Moffatt;

and the Defendants' Memorandum of Law, all being filed contemporaneously with this Motion.

Wherefore, Wayne Township and the Wayne Township Fire Department, by counsel, Christine L. Zook, pray that the Court enter summary judgment in their favor, and against Plaintiff Kristine Rednour, with respect to all claims raised against the Defendants, and for all other just and proper relief in the premises.

Respectfully submitted,

/s/ Christine L. Zook
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Wayne Township Fire Department

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21st day of February, 2014, the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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